

Thomas Gorman

From: Elizabeth Haring <lizharing@yahoo.com>
Sent: Thursday, September 27, 2018 10:41 AM
To: Guzinski Joseph (USTP); mmichel@chapter13alexva.com;
tgorman@chapter13alexva.com
Subject: Notice of Deposition - October 1
Attachments: Notice of Trustee Depositions.pdf

Dear Mr. Gorman, Mr. Guzinski and Mr. Michel,

Please find attached the notice of your depositions for Monday, October 1, which includes the documents required to be produced. The notice was also sent by fax.

I am going to schedule additional depositions and you will receive notice of them as well.

Rudiger & Green advised they will provide coffee and water.

I look forward to seeing you on Monday at 1 pm.

Sincerely,
Elizabeth Haring Coomes

In the
United States Bankruptcy Court
For the Eastern District of Virginia
Alexandria Division

In re: Elizabeth H. Coomes,
Debtor

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:
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Case No: 17-13497-BFK
Chapter 13

NOTICE OF DEPOSITION

PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and Rule 7030-1 of the Local Rules of Bankruptcy Practice and Procedure, the Debtor will take the deposition of the standing chapter 13 Trustee **Thomas P. Gorman**.

The deposition will commence October 1, 2018, beginning at 1:00 p.m. (EST) at the offices of Rudiger & Green located at:

Rudiger & Green
4116 Leonard Drive
Fairfax, VA 22030

or on such other date and at such other location as mutually agreed by the standing Chapter 13 Trustee and the Debtor. The deposition will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by audio, video and/or stenographic means.

Pursuant to Rule 34, the Debtor requires the standing Chapter 13 Trustee to produce the following documents at the deposition:

All records related to Debtor's complaints to Joseph Guzinski regarding the standing Chapter 13 Trustee, including but not limited to, the standing Chapter 13 Trustee's response(s).

All appeal briefs in the *No v. Gorman* appeals (appellant briefs, appellee brief and replies)

All evidence and records that led the Trustee to believe Debtor did not receive regular income from the corporation Old Town Insurance & Financial Services, Inc.

All evidence and records that led the Trustee to believe Debtor's case was filed in bad faith

All evidence and records that led the Trustee to believe Debtor's case was filed solely to try to obtain a loan modification

All evidence and records that Debtor engaged in unreasonable delay

All authority that the stay of her personal injury matter is grounds for dismissal with prejudice

All authority that the brief delay in listing the lots is grounds for dismissal with prejudice

All authority that a corporate reorganization case is grounds for dismissal with prejudice of an individual Debtor's chapter 13 case

All evidence and authority that Debtor was "in bankruptcy" for nearly 6 years without a confirmed plan.

A handwritten signature in black ink, appearing to read "Elizabeth H. Coomes".

ELIZABETH H. COOMES
Debtor

Dated: September 27, 2018
Villanova, PA

In the
United States Bankruptcy Court
For the Eastern District of Virginia
Alexandria Division

In re: Elizabeth H. Coomes,
Debtor

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Case No: 17-13497-BFK
Chapter 13

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PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and Rule 7030-1 of the Local Rules of Bankruptcy Practice and Procedure, the Debtor will take the deposition of the United States Trustee **Joseph Guzinski**

The deposition will commence October 1, 2018, beginning at 1:00 p.m. (EST) at the offices of Rudiger & Green located at:

Rudiger & Green
4116 Leonard Drive
Fairfax, VA 22030


or on such other date and at such other location as mutually agreed by the United States Trustee and the Debtor. The deposition will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by audio, video and/or stenographic means.

Pursuant to Rule 34, the Debtor requires the United States Trustee to produce the following documents at the deposition:

All records related to Debtor's complaints to Joseph Guzinski regarding the standing Chapter 13 Trustee, including but not limited to, the standing Chapter 13 Trustee's response(s).

All records related to other complaints regarding the standing Chapter 13 Trustee, including but not limited to, the standing Chapter 13 Trustee's response(s).

All disciplinary action(s) taken regarding the standing Chapter 13 Trustee.


ELIZABETH H. COOMES
Debtor

Dated: September 27, 2018
Villanova, PA

In the
United States Bankruptcy Court
For the Eastern District of Virginia
Alexandria Division

In re: Elizabeth H. Coomes,
Debtor

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Case No: 17-13497-BFK
Chapter 13

NOTICE OF DEPOSITION

PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and Rule 7030-1 of the Local Rules of Bankruptcy Practice and Procedure, the Debtor will take the deposition of Marcelo R. Michel

The deposition will commence October 1, 2018, beginning at 1:00 p.m. (EST) at the offices of Rudiger & Green located at:

Rudiger & Green
4116 Leonard Drive
Fairfax, VA 22030

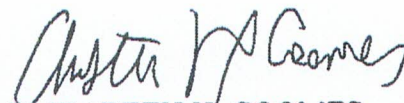
or on such other date and at such other location as mutually agreed by Marcelo Michel and the Debtor. The deposition will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by audio, video and/or stenographic means.

Pursuant to Rule 34, the Debtor requires Marcelo R. Michel to produce the following documents at the deposition:

All records related to Debtor's complaints to Joseph Guzinski regarding the standing Chapter 13 Trustee, including but not limited to, the standing Chapter 13 Trustee's response(s).

All records related to other complaints regarding the standing Chapter 13 Trustee, including but not limited to, the standing Chapter 13 Trustee's response(s).

All disciplinary action(s) taken regarding the standing Chapter 13 Trustee.

A handwritten signature in black ink, appearing to read "Elizabeth H. Coomes", written in a cursive style.

ELIZABETH H. COOMES

Debtor

Dated: September 27, 2018
Villanova, PA